
From: Geoffrey fernald <nrivikings8@gmail.com>
Sent: Wednesday, June 25, 2025 2:04 AM
To: RID_ECF_INTAKE
Subject: *Case No.:**1:25-cv-00294
Attachments: COVER LETTER FOR FILING OF MOTION TO AMEND AND ADDITIONAL EXHIBITS.pdf; AFFIDAVIT OF ELIZABETH UPSHAW.pdf; MOTION TO AMEND COMPLAINT AND ADMIT ADDITIONAL EXHIBITS A1.0 THROUGH A1.6.pdf; EXHIBIT A1.6 INDEPENDENT WITNESS.pdf; EXHIBIT A1.5_ ONGOING LEGAL VIOLATIONS SUMMARY.pdf; EXHIBIT A1.4_ PSYCHOLOGICAL HARM TIMELINE.pdf; EXHIBIT A1.3_ SYSTEM ADMISSIONS AND SELF-INCRIMINATING STATEMENTS.pdf; EXHIBIT A1.2_ TERMINATION FAILURE EVIDENCE.pdf; EXHIBIT A1.1_ ORIGINAL INTENT VS SYSTEM DEVIATION ANALYSIS.pdf; EXHIBIT A1.0 MASTER TIMELINE & CASE.pdf; MOTION FOR SEALING OF EXHIBIT A1-1.pdf

Categories: Being Worked on CH

CAUTION - EXTERNAL:

ELECTRONIC FILING EMAIL TO COURT CLERK

Dear Clerk of Court,

FILING SUBMISSION DETAILS

Case: Geoffrey Fernald v. OpenAI, Inc.

Plaintiff: Geoffrey Fernald (Pro Se)

Defendant: OpenAI, Inc.

Filing Type: Motion to Amend Complaint and Additional Exhibits

Filing Date: June 26, 2025

ATTACHED DOCUMENTS (11 FILES TOTAL)

PRIMARY MOTIONS:

1. **Cover_Letter_Filing.pdf** - Cover letter and filing instructions
2. **Motion_to_Amend_Complaint.pdf** - Motion requesting permission to add exhibits
3. **Motion_for_Sealing_A15_A17.pdf** - Sealing motion for personal/medical information

SUPPORTING EVIDENCE:

4. **Affidavit_Elizabeth_Upshaw.pdf** - Independent witness authentication

EXHIBITS A1.0-A1.6:

5. **Exhibit_A1.0_Master_Timeline.pdf** - Case overview and timeline
6. **Exhibit_A1.1_Original_Intent_vs_Deviation.pdf** - System deviation analysis
7. **Exhibit_A1.2_Termination_Failure.pdf** - Evidence of system non-compliance
8. **Exhibit_A1.3_System_Admissions.pdf** - AI system self-incriminating statements
9. **Exhibit_A1.4_Psychological_Harm.pdf** - Medical timeline (SEALING REQUESTED)
10. **Exhibit_A1.5_Legal_Violations.pdf** - Federal law violations summary
11. **Exhibit_A1.6_Independent_Witness.pdf** - Cross-account privacy violation evidence

FILING INSTRUCTIONS**PUBLIC FILING REQUESTED:**

- Cover Letter
- Motion to Amend Complaint
- Affidavit of Elizabeth Upshaw (with personal contact info redacted)
- Exhibits A1.0, A1.1, A1.2, A1.3, A1.5, A1.6 (with partial sealing for personal info only)

SEALING REQUESTED:

- **Complete Sealing:** Exhibit A1.4 (contains sensitive medical information)
- **Partial Sealing:** Personal contact information in Exhibit A1.6 only (technical evidence should remain public)

EXPEDITED CONSIDERATION REQUESTED:

This matter involves evidence of systematic privacy violations affecting millions of ChatGPT users and poses immediate threats to public safety requiring urgent judicial attention.

CASE SIGNIFICANCE

This filing presents independent witness video evidence proving that OpenAI's ChatGPT system cannot maintain account boundaries between users, resulting in systematic cross-account privacy violations affecting millions of users nationwide. The evidence demonstrates immediate threats to public safety requiring urgent judicial and regulatory intervention.

PLAINTIFF CONTACT INFORMATION

Geoffrey Fernald

19 Transit St

Woonsocket, Rhode Island 02895

Phone: (401) 263-5360

Email: nrvikings8@gmail.com

Available for any questions regarding this filing.

SERVICE OF PROCESS

Upon filing, I will serve copies of all documents on Defendant OpenAI, Inc. via certified mail to:

OpenAI, Inc.

3180 18th St

San Francisco, CA 94110

FILING FEES

Please advise if any filing fees are required. I am prepared to pay electronically or via other accepted payment methods upon notification.

TECHNICAL SPECIFICATIONS

All documents are provided in PDF format. If any formatting issues are encountered, please contact me immediately at the above email address or phone number.

CERTIFICATE OF ELECTRONIC FILING

I certify that:

1. All attached documents are true and accurate copies
2. This filing complies with Local Rules for electronic filing
3. I am authorized to file these documents as Pro Se Plaintiff
4. Service will be completed on Defendant as required by Federal Rules

Thank you for your assistance in processing this important filing involving systematic AI privacy violations affecting millions of users.

Respectfully submitted,

Geoffrey Fernald

Pro Se Plaintiff

Fernald v. OpenAI, Inc.

Email: nrvikings8@gmail.com

Phone: (401) 263-5360

Date: June 26, 2025

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